

USEPA Review of the Responses to Comments on the Draft Final Status Survey of the Former Naval Radiological Defense Laboratory (NRDL) Site, Former Hunters Point Naval Shipyard, San Francisco, California, and the Draft Final Final Status Survey of the Former NRDL Site, Former Hunters Point Naval Shipyard, San Francisco, California, January 2018

Most of the previous USEPA comments were addressed and incorporated into the NRDL FSSR; the exceptions are noted in the comments below.

Evaluation of the Response to Item 4, EPA General Comment #3: The response and text revision partially addresses the comment in clarifying that Plutonium-239 (Pu-239) was only analyzed for when Strontium-90 (Sr-90) was found to exceed the release criteria. However, the revisions do not address why it was assumed that Pu-239 would only be present if Sr-90 was present above the release criteria. According to Table 5-1, Atomic Energy Commission Licenses Associated with HPS Sorted by License, of the Historical Radiological Assessment Volume II, indicates that the Naval Radiological Defense Laboratory (NRDL) was licensed to have 2000 grams of Pu-239 and 55 grams of Pu-238 under license SNM-35. The description of this material indicates it was not contained in a sealed source and it was used on-site for various applications that did not necessarily involve the use of Sr-90. Please provide revise the Draft Final Final Status Survey of the Former NRDL Site, Former Hunters Point Naval Shipyard, San Francisco, California, Former Hunter's Point Naval Shipyard, San Francisco (the NRDL FSSR) to include a detailed justification for the assumption that Pu-239 would not be present unless Sr-90 was also present, given the use of Pu-239 by the NRDL.

Evaluation of the Response to Item #7, EPA Specific Comment #3: The response partially addresses the comment. A number of radiological commodities have been found in the vicinity of the Reference Area, and it is unclear if any radiological commodities have been found in the Reference Area. Please revise the NRDL FSSR to clarify whether any radiological commodities have been found in the Reference Area and specify the distance between the Reference Area and the closest radiological commodity that has been found in that area of Parcel D-1.